REMARKS

Status of the Claims

- Claims 6-12 and 25-31 are pending in the Application.

- Claims 6-12 and 25-31 stand rejected by the Examiner.

Claim Rejections Pursuant to 35 U.S.C. §103

Claims 6-8, 10, 12, 25-27, 29 and 31 stand rejected under 35 U.S.C. §103(a) as unpatentable over an article by Arlen, H. Gray entitled *TeleZoo.com Gives Boost to Telecom/IT*, 10/5/1999 in view of U.S. Patent No. 6,708,161 to Tenorio et al. Applicants respectfully traverse the rejection.

Arlen discloses efforts by TeleZoo corporation to introduce a web site, Telezoo.com, that includes a proprietary search engine to deliver product and service comparisons. (Arlen, P2, para. P4). Arlen reports that Telezoo has established a standardized descriptive system that lets customers examine specific features of products from multiple vendors and configure a telecommunications or information technology (IT) order online. (Arlen, p. 2, para. P5). Travelzoo's search engine matches products with buyer's requirements. (Arlen, p3, para. P4). Arlen discloses that vendors product information databases are not standardized. Arlen states:

> "The comparative process, of course, is often unpopular with vendors,
> who go to great lengths to differentiate products or create unique features
> so that their products cannot be commoditized. But such obfuscation is at
> the heart of customer's complaints. Moreover, Telezoo claims its structure
> will put small, specialized vendors on the same level with bigger brand
> vendors if they have comparable products *after the customized
> descriptions have been stripped away*." (Arlen, p 3, para. P7).

Thus, Arlen discloses a search engine that matches buyers requirements with products and strips away vendor provided "customized descriptions" from non-standard product descriptive information for the purpose of product comparisons for buyers.

Tenorio et al. discloses a method for selectively indexing a database using selected fields, determining the total time required for reading data from the fields during a selected time period if the fields are indexed, determining the total time required for reading data from the fields during the selected time period if the fields are not indexed, determining the total time required for writing data to the fields during the selected time period if the fields are

indexed, determining the total time required for writing data to the fields during the selected time period if the fields are not indexed and evaluating the total times required for reading and writing data to the fields to determine whether the fields should be indexed. (Col 1, line 56 through col. 2 line 4 and Claims 1, 21).

In addition, Tenorio et al. also teaches a global content directory (GCD) that accesses a number of seller databases concerning vast numbers of products (Col. 2, lines 5-9 and Figure 1). Tenorio et al. states:

> This access to vast numbers of products is provided *without* the requirement that all data about the products be stored in a global database (which would greatly decrease performance). Instead the product data may be stored in seller databases that can be readily accessed from the global content directory (col. 2 lines 20-26).

Tenorio et al. states this invention principle again by stating:

> These advantages are realized since GCD 42 provides access to presentation of global product data *without actually storing* all such data. (col. 7, lines 7-9).

Claim 6 of the present invention recites, in relevant part;

> A method comprising:
>   (a)...
>   (c)   providing an interface for use by product manufacturers for entry of new product specification data into the database and for modifying existing product specification data in the database, the interface requiring each manufacturer to use a same schema when entering or modifying product specification data in a particular product class; ...

Arlen, as discussed above, uses a search engine to match vendor products with buyers requirements, collect vendor product data, and strip out "customized descriptions" for the purpose of performing product comparisons for buyers. The method of Claim 6 recites no search engine, recites no buyers product requirements, does not strip out custom descriptions provided by vendors, and does not perform comparisons for buyers. Instead, element (c) of Claim 6 essentially recites the use of a schema, used by product manufactures for entry of new product specification data into the database and for modifying existing product specification data in the database where each manufacturer is required to use a same schema when entering or modifying the product specification data in a particular product class. Arlen

does not disclose that manufactures are required to use the same schema when entering or modifying product specification data in a particular product class as recited in Claim 6. In fact, Arlen places no requirements on vendor product data at all because it filters the product data after it acquires the product data from vendors.

Applicants submit that the search engine of Arlen searches for vendor product specification data using buyers product requirements and then filters the data to remove "customized descriptions". Whereas the recital of Claim 6 requires manufactures to enter or modify product specification data using a schema. Applicants submit that Claim 6 recites no product specification stripping or filtering operation as disclosed by Arlen because the stripping or filtering operation is unnecessary in the claimed invention. Accordingly, the method disclosed by Arlen, where product data containing customized descriptions by vendors is acquired by a search engine and then stripped of the customized descriptions is incompatible with the recitation of Claim 6 which requires no search engine and no post-entry filtering of product specification data. In addition, Applicants cannot find evidence that product manufacturers, under the disclosure of Arlen, are required to use a same schema when entering or modifying product specification data in a particular product class as recited in Claim 6. In fact, Arlen assumes that product data is not made uniform by vendors. Otherwise, it would not be necessary to filter out the "customized descriptions". Accordingly, Applicants disagree that Arlen teaches element (c) of Claim 6.

Applicants submit the disclosure of Arlen, using a search engine and subsequent filtering of product specification data teaches away from the claimed invention because Arlen teaches a method that is incompatible with Claim 6 which requires no search engine, no filtering, and relies on a required schema for data entry and modification by the vendors. Thus, Applicants submit that Arlen not only does not teach all elements of Claim 6, but is also incompatible and teaches away from the recitation of Claims 6.

The Examiner states that Arlen does not teach element (b) of Claim 6. Applicants agree. However, Applicants disagree the element (b) of Claim 6 is taught by Tenorio et al.

Element (b) of Claim 6 recites:

> (b)   defining, for each product class, a schema for the entry of
> specification data of products in the product class;

The Examiner cites a GUID description (Tenorio et al., Col. 8 lines 5-39) to include the product class as recited in element (b) of Claim 6. Respectfully, Applicants cannot find evidence that Tenorio et al. teaches that a schema is defined for each GUID as would be needed if Tenorio et al. were to disclose element (b) of Claim 6. Accordingly, Applicants disagree that Tenorio et al. teaches element (b) of Claim 6.

Applicants also submit that the teachings of Tenorio et al. are incompatible with the recitation of Claim 6 because Tenorio et al. teaches that an advantage is realized using a global content directory (GCD) server because it provides access to and presentation of global product data *without actually storing all of such data.* (Tenorio et al. col. 7, lines 7-9). The problem of data storage in a single product database is a disadvantage that Tenorio et al. addresses with the GCD (Tenorio et al., col. 4, lines 52-61). Applicants contrast this with the recitation of Claim 6 which hosts, on a server, a database of specification data of products of a plurality of different manufacturers. Applicants note that no limitation exists on the server of Claim 6 that it need not itself store the product specification data.

Applicants respectfully submit that the Examiner has failed to establish a prima facie case of obviousness per 35 U.S.C §103(a) (See MPEP 706.02(j)). Applicant notes that neither Arlen nor Tenorio et al., either alone or in combination, teach or suggest the invention recited in Claim 6 because all elements are not present in the references. Specifically, at least elements (b) and (c) are missing from the cited references. Since independent Claim 25 has similar limitations as in independent Claim 6, the combination of Arlen and Tenorio et al. cannot render obvious Claims 6 or 25. Applicants respectfully request withdrawal of the 35 U.S.C. §103(a) rejection of Claims 6 and 25 as these claims patentably define over the cited art.

Similarly, in as much as Claims 7-12 and 26-31 depend on Claims 6 and 25 respectively, Applicants respectfully submit that these dependent claims also patentably define over the cited art for the reasons provided above. Therefore, Applicants respectfully request withdrawal of the 35 U.S.C. §103(a) rejection of dependent Claims 6-12 and 25-31.

Conclusion

In view of the above remarks, Applicants submit that the present application is in a condition for allowance upon entry of the amendments herein. Applicants earnestly solicit a Notice of Allowance for all pending claims.

Respectfully submitted,

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